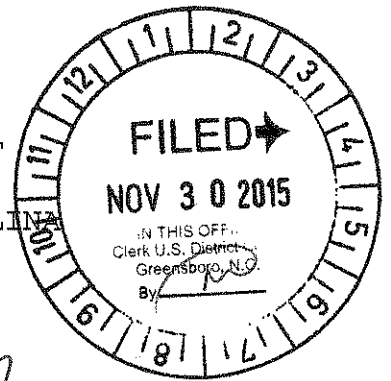


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 v. : 1:15CR 402-1
 :
 MICHAEL KELLY DOWDY, II :

The Grand Jury charges:

COUNT ONE

From in or about August, 2015, continuing up to and including in or about October, 2015, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, MICHAEL KELLY DOWDY, II, knowingly did receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT TWO

On or about August 28, 2015, in the County of Guilford, in the Middle District of North Carolina, MICHAEL KELLY DOWDY, II, knowingly did distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in

interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT THREE

On or about September 14, 2015, in the County of Guilford, in the Middle District of North Carolina, MICHAEL KELLY DOWDY, II, knowingly did distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT FOUR

On or about October 15, 2015, in the County of Guilford, in the Middle District of North Carolina, MICHAEL KELLY DOWDY, II, did knowingly possess materials which contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), said child pornography containing an image that involved a prepubescent minor and a minor who had not yet attained 12 years of age, and which materials had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was

produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).


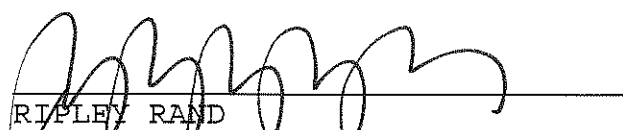
FORFEITURE ALLEGATION

Upon conviction of the offenses alleged above, the defendant, MICHAEL KELLY DOWDY, II, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Section 2252A, and all property, real or personal, used or intended to be used to commit or promote the commission of the offense of conviction, including but not limited to the following items that were obtained from defendant on October 15, 2015:

- a. One Gateway Laptop Computer, serial number T4C8311011203;
- b. One WD 250 Gigabyte Hard Drive, serial number WXC108C19539;
- c. One WD My Passport External Hard Drive, serial number WX11A55N9CJE;
- d. One Toshiba 2 Terabyte External Hard Drive, serial number Y3CATT76TYP3; and
- e. One PNY Thumb Drive.

All in accordance with Title 18, United States Code,
Section 2253, and Rule 32.2, Federal Rules of Criminal
Procedure.

A TRUE BILL:


ERIC L. IVERSON
ASSISTANT UNITED STATES ATTORNEY
RIPLEY RAND
UNITED STATES ATTORNEY